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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

1315 W. 4th Avenue • Kennewick, Washington 99336-6018 • (509) 735-7581

December 4, 2003

Mr. Roy J. Schepens
Office of River Protection
United States Department of Energy
P.O. Box 450, MSIN H6-60
Richland, Washington 99352

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EDMC

Dear Mr. Schepens:

Re: Request for a Variance from Secondary Containment Standards for Ten Double-Shell Tank (DST) System Dangerous Waste Transfer Lines, 03-ED-127, September 4, 2003

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The Washington State Department of Ecology (Ecology) has reviewed the United States Department of Energy's (USDOE) request for a variance to operate ten (10) waste transfer lines (SN-277, SN-278, SN-279, SN-280, SL-177, SL-178, SL-179, SN-285, SN-286, and LIQW-702) without system upgrades on the end one-foot section of the line which penetrates either a pit or building wall. This one-foot section of line is non-compliant, as it does not have secondary encasement as required by Washington Administrative Code (WAC) 173-303-640(4).

The WAC 173-303-640 (4)(g) requires that to grant a variance based on a demonstration of equivalent protection of ground water and surface water, the department will consider:

- A. The nature and quantity of the waste;
- B. The proposed alternate design and operation;
- C. The hydrogeologic setting of the facility, including the thickness of the soils present between the tank system and ground water; and
- D. All other factors that would influence the quality and mobility of the dangerous constituents and the potential for them to migrate to ground water or surface water.

The DST Part B permit application provides much of the information for Ecology to assess the feasibility for granting a variance. Your letter states that standard operating practices will monitor transfer lines for leakage. Please provide Ecology with information regarding these practices.

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Ecology concurs that all ten lines must have an integrity assessment performed and certified by the independent, qualified, registered professional engineer in accordance with the Hanford Federal Facility Agreement and Consent Order Milestone M48. Ecology will provide conditions for the type and frequency of leak testing, or other applicable design or operating requirements, needed on these ten lines in the final status DST permit, if a variance is granted.

Ecology will make a determination on the variance once the information requested is provided. If you have any questions regarding this letter, please contact, me at (509) 736-5707 or Jeff Lyon at (509) 736-3098.

Sincerely,



Brenda K. Jentzen
Permit Lead, Double Shell Tank System
Nuclear Waste Program

lkd

cc: Mary Jarvis, USDOE
Brad Erlandson, BNI
Edward Aromi, CHG
Chris Kemp, CHG
Phil Miller, CHG
John Bates, FHI
Todd Martin, HAB
John Cox, CTUIR
Stuart Harris, CTUIR
Patrick Sobotta, NPT
Russell Jim, YN
Ken Niles, OOE
Al Conklin, WDOH
Administrative Record: DST and Tank Waste Storage
Environmental Portal, LMSI